

The Honorable Kymberly K. Evanson

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KHUSHWINDER SINGH,

Plaintiff,

v.

ALEDADE, INC.,

Defendant.

No.: 2:21-cv-0410-KKE

STIPULATED MOTION AND
[PROPOSED] ORDER FOR
EXTENSION OF TIME OF
CERTAIN PRE-TRIAL DATES

NOTE ON MOTION CALENDAR:
July 11, 2025

Plaintiff Khushwinder Singh (“Plaintiff”) and Defendant Aledade, Inc. (“Defendant”), by and through their attorneys of record, submit this Stipulation and Proposed Order, and respectfully request that the Court enter the proposed order for extensions of time of certain pre-trial dates as set forth below.

1. Pursuant to the Court’s June 18, 2025 Order, the Parties’ deadline to submit dispositive motions is July 14, 2025, and the trial date is continued from October 27, 2025 to November 10, 2025. (ECF No. 68).

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Corr Cronin, LLP
1015 Second Avenue, Floor 10
Seattle, WA 98104-1001
(206) 625-8600

1 2. Pursuant to the Court's June 27, 2025 Order, the Court allowed the deposition of
2 Sarah Chasson to take place after the close of discovery on June 30, 2025, and directed the Parties
3 to file a Joint Status Report by July 3, 2025 providing the status of Ms. Chasson's deposition and
4 proposing any amendments to the case schedule. (ECF No. 72).

5 3. As set forth in the Joint Status Report filed by the Parties on July 3, 2025 (ECF No.
6 73), Plaintiff will take the deposition of non-party Sarah Chasson on July 15, 2025. The Parties
7 proposed amendments to the case schedule in light of the July 15, 2025 deposition of Ms. Chasson.

8 4. Accordingly, the Parties respectfully requests that the Court extend certain pre-trial
9 deadlines as follows:

10 a. The deadline to submit dispositive motions be extended from July 14, 2025 to July
11 31, 2025.

12 b. The time for filing motions in limine be extended from September 22, 2025 to
13 October 6, 2025.

14 c. The time for proposed jury instructions, the agreed LCR 16.1 Pretrial Order,
15 including exhibit list with completed authenticity, admissibility, and objections
16 fields be extended from October 6, 2025 to October 20, 2025.

17 d. The time for trial briefs, proposed voir dire questions, and deposition designations
18 be extended from October 14, 2025 to October 28, 2025.

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STIPULATED MOTION AND [PROPOSED] ORDER
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Corr Cronin, LLP
1015 Second Avenue, Floor 10
Seattle, WA 98104-1001
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DATED this 11th day of July, 2025. I certify that this document contains 300 words, in compliance with the Local Civil Rules.

By: s/ Joseph D. Gehrke

Joseph D. Gehrke, WSBA No. 47474
Seth Rosenberg, WSBA No. 41660
THE SEATTLE LITIGATION GROUP,
PLLC
1215 4th Avenue, Suite 1100
Seattle, WA 98161
(206) 407-3300
seth@seattlelitigation.com
joe@seattlelitigation.com

Stephen Teller, WSBA No. 23372
TELLER LAW
300 Lenora St., #1471
Seattle, WA 98121
(206) 324-8969
Steve@stellerlaw.com

Attorneys for Plaintiff

By: s/ Jeffrey Coopersmith

Jeffrey Coopersmith, WSBA No. 30954
CORR CRONIN, LLP
1015 Second Avenue, Floor 10
Seattle, WA 98104-1001
(206) 625-8600
jcoopersmith@corrchronin.com

LisaMarie Collins (*Pro Hac Vice*)
MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY AND POPEO, P.C.
919 Third Avenue
New York, NY 10022
(212) 953-3000
LCollins@mintz.com

Nicole E. Henry (*Pro Hac Vice*)
MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY AND POPEO, P.C.
One Financial Center
Boston, MA 02111
(617) 542-6000
NEHenry@mintz.com

Karen S. Lovitch (*Pro Hac Vice*)
MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY AND POPEO, P.C.
555 12th Street NW, Suite 1100
Washington, DC 20004
(202) 434-7300
kslovitch@mintz.com

Attorneys for Defendant

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Corr Cronin, LLP
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ORDER

IT IS SO ORDERED.

DATED this ____ day of _____, 2025.

Kymberly K. Evanson
United States District Judge

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